

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
(CHARLESTON DIVISION)

CHRISTINE BORDEN,

Plaintiff,

v.

BANK OF AMERICA, N.A.; WESTCLIFF  
TECHNOLOGIES, INC., d/b/a National Bitcoin  
ATM, and Cash Cloud, Inc., d/b/a Coin Cloud,

Defendants.

**Case No. 2:22-cv-04076-BHH**

**Motion in Support of  
*Pro Hac Vice* Application**

The undersigned local counsel hereby moves, together with the attached Application and Affidavit, that Vincent Renda, Esq., be admitted *pro hac vice* in the above-captioned case as associate counsel. As local counsel, I understand that:

1. I will personally sign and include my District of South Carolina federal bar attorney identification number on each pleading, motion, discovery procedure, or other document that I serve or file in this court; and
2. All pleadings and other documents that I file in this case will contain my name, firm name, address, and phone number, and those of my associate counsel admitted *pro hac vice*; and
3. Service of all pleadings and notices as required shall be sufficient if served upon me, and it is my responsibility to serve my associate counsel admitted *pro hac vice*; and
4. Unless excused by the court, I will be present at all pretrial conferences, hearings, and trials and may attend discovery proceedings. I will be prepared to actively participate if necessary.
5. Certification of Consultation (Local Civil Rule 7.02).

☒ Prior to filing this Motion, I conferred with opposing counsel who has indicated the following position as to this Motion: ☐ will likely oppose; ☒ does not intend to oppose

☐ Prior to filing this Motion, I attempted to confer with opposing counsel but was unable to do so for the following reason(s): n/a

☐ No duty of consultation is required because the opposing party is proceeding pro se.

Respectfully Submitted,

BEST LAW, P.A.

/s/ Tara E. Nauful

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Attorneys for Westcliff Technologies, Inc.

December 21, 2022